

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to: All Cases

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

AMENDED NOTICE OF DEPOSITION

TO: JOHN KAPOOR C/O: BRIAN KELLY AND KURT MULLEN
NIXON PEABODY, LLP

PLEASE TAKE NOTICE THAT, pursuant to Federal Rule of Civil Procedure 45(a)(4),
plaintiffs will take the deposition upon oral examination of the following:

Dr. John Kapoor

The deposition shall commence on June 6, 2019, at 9:00 a.m., at the law offices of
Ballard Spahr, 1 E. Washington St., Ste. 2300, Phoenix, AZ 85004, or at such other time and
location as agreed upon by the parties, and shall be taken before a duly certified court reporter
and notary public or other person authorized by law to administer oaths for the purpose of
discovery, for use at trial, or for such other purposes as permitted by the Federal Rules of Civil
Procedure. The deposition will be recorded by stenographic means and by videotape.

Pursuant to Federal Rules of Civil Procedure 30(b)(2) and 34, Dr. Kapoor shall produce
any documents and things responsive to the subject matter identified in Attachment A to
undersigned counsel no later than then (10) days prior to the date of the deposition. If you are
claiming privilege regarding any of the documents responsive to the requests set forth in
Attachment A, a privilege log detailing such claims of privilege must be produced no later than
ten (10) days prior to the date of the deposition.

You are invited to attend and participate in this deposition.

Dated: May 14, 2019

s/ Christopher Schnieders

Christopher Schnieders
Napoli Shkolnik, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of May 2019, the foregoing has been served via email only to the following counsel:

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SCHEDULE A: DOCUMENTS TO BE PRODUCED

1. All Documents requested in the Subpoena.
2. All Documents reviewed or discussed in preparation for the Deponent's deposition.
3. All Documents produced in the criminal action captioned *United States v. John Kapoor, et al.*, District of Massachusetts, 16-CR-10343.
4. All electronic mail, voice mail or other correspondence exchanged between the witness and any other member of the Insys board of directors that relates to Subsys.
5. A curriculum vitae, LinkedIn profile or other document summarizing the witness's educational and professional background.